

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In Re:

GREEN BOX NA GREEN BAY, LLC,
Debtor.

Case No. 16-24179

Chapter 11

**OBJECTION TO RENEWED MOTION OF ABILITY INSURANCE COMPANY FOR
RELIEF FROM STAY PURSUANT TO 11 U.S.C. §362(D)1)**

NOW COMES the Debtor, Green Box NA Green Bay, LLC, by its attorneys, Steinhilber Swanson LLP, by Paul G. Swanson, and hereby objects to the Motion of Ability Insurance Company for Relief from Stay Pursuant to 11 U.S.C. §362(D)(1). As grounds for such Objection, the Debtor asserts as follows:

1. It is current in Adequate Protection payments, having escrowed real estate taxes in an amount sufficient pursuant to the terms of the Order.
2. It has continuously had insurance on the premises pursuant to the Order for Adequate Protection.
3. The real estate is necessary for the Plan, which is to be filed shortly.

WHEREFORE, the Debtor requests that this matter be set for a hearing, and that the Motion be denied.

Dated: September 13, 2016.

STEINHILBER SWANSON LLP
Attorneys for the Debtor

By: 

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